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*Attorneys for Defendants:*

MILLENNIUM FUNDING, INC.; BODYGUARD PRODUCTIONS, INC.; UN4 PRODUCTIONS, INC.; HOMEFRONT PRODUCTIONS, INC.; MILLENNIUM MEDIA, INC.; CRIMINAL PRODUCTIONS, INC.; CLEAR SKIES NEVADA, LLC; HUNTER KILLER PRODUCTIONS, INC.; LHF PRODUCTIONS, INC.; RAMBO V PRODUCTIONS, INC.; FALLEN PRODUCTIONS, INC.; WICKED NEVADA, LLC; 211 PRODUCTIONS, INC.; FATHERS & DAUGHTERS NEVADA, LLC; VOLTAGE DEVELOPMENT NCCF, LLC; HB PRODUCTIONS, INC.; STATUS UPDATE, LLC; STOIC PRODUCTIONS, INC.; COBBLER NEVADA, LLC; SURVIVOR PRODUCTIONS, INC.; TREVOR SHORT; and AVI LERNER

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

HURRICANE ELECTRIC LLC,

Plaintiffs,

v.

MILLENNIUM FUNDING, INC., et al.

Defendants.

Case No.: 2:20-cv-01034-JCM-DJA

**STIPULATION FOR DISMISSAL WITH  
COURT RETAINING JURISDICTION TO  
ENFORCE SETTLEMENT AGREEMENT**

HURRICANE ELECTRIC, LLC ("Plaintiff"), through its counsel Neil D. Greenstein and Joshua M. Dickey, and MILLENNIUM FUNDING, INC.; BODYGUARD PRODUCTIONS, INC.; UN4 PRODUCTIONS, INC.; HOMEFRONT PRODUCTIONS, INC.; MILLENNIUM MEDIA, INC.; CRIMINAL PRODUCTIONS, INC.; CLEAR SKIES NEVADA, LLC; HUNTER

1 KILLER PRODUCTIONS, INC.; LHF PRODUCTIONS, INC.; RAMBO V PRODUCTIONS,  
2 INC.; FALLEN PRODUCTIONS, INC.; WICKED NEVADA, LLC; 211 PRODUCTIONS,  
3 INC.; FATHERS & DAUGHTERS NEVADA, LLC; VOLTAGE DEVELOPMENT NCCF,  
4 LLC; HB PRODUCTIONS, INC.; STATUS UPDATE, LLC; STOIC PRODUCTIONS, INC.;  
5 COBBLER NEVADA, LLC; SURVIVOR PRODUCTIONS, INC.; TREVOR SHORT; and AVI  
6 LERNER ("Defendants"), through their counsel Kerry S. Culpepper and F. Christopher Austin,  
7 submit this stipulation for dismissal.

8 The parties have agreed to a settlement. Pursuant to Federal Rule of Civil Procedure  
9 41(a)(2), the parties request that the Court dismiss this action and all claims and potential  
10 counterclaims subject to the Court retaining jurisdiction to enforce the terms of a written  
11 Confidential Settlement Agreement.

12 Each party is to bear its own costs and attorneys' fees.

13 Dated this 27th day of February, 2021.

Dated this 27th day of February, 2021.

14 **CULPEPPER IP, LLC**

**BAILEY ♦ KENNEDY**

15 By: /s/ Kerry S. Culpepper  
16 KERRY S. CULPEPPER  
17 (ADMITTED PRO HAC VICE)  
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By: /s/ Joshua M. Dickey  
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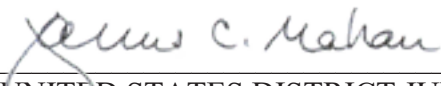
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In Association With:  
NEIL D. GREENSTEIN  
(ADMITTED PRO HAC VICE)  
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Tysons, Virginia 22102

21 *Attorneys for Defendants*

*Attorneys for Plaintiff*  
Hurricane Electric LLC

22 IT IS SO ORDERED:  
23  
24

25   
26 UNITED STATES DISTRICT JUDGE

27 Dated: March 3, 2021  
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